



*State of New Jersey*

OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF LAW  
25 MARKET STREET  
PO Box 112  
TRENTON, NJ 08625-0112

PHILIP D. MURPHY  
*Governor*

SHEILA Y. OLIVER  
*Lt. Governor*

MATTHEW J. PLATKIN  
*Attorney General*

MICHAEL T.G. LONG  
*Director*

November 29, 2022

**Via Electronic Filing**

Honorable Matthew J. Skahill, U.S.M.J.  
Mitchell H. Cohen U.S. Courthouse  
1 John F. Gerry Plaza-4<sup>th</sup> & Cooper Sts.  
Camden, New Jersey 08101

Re: Eric Hines v. Gary Lanigan, et al,  
Civil Action No.: 17-cv-02864 (NLH-MJS)

Dear Judge Skahill:

I represent New Jersey Department of Corrections, Gary Lanigan, Marcus Hicks, Willie Bonds, Senior Corrections Officer ("SCO") Marvin, SCO Waters, Sergeant J. Vallie, Luz Torres, Linda Linen, SCO T. Jackson, Corrections Officer ("CO") Moratelli, CO L. Smith, SID Goffred, CO McNear, Sergeant Horsey, CO Bagliani, Sergeant Pipitone and CO M. Fardone in this matter. On September 23, 2022, Defendants were served with interrogatories and document request for eighteen DOC officers and officials. Plaintiff also directed interrogatories and document requests to medical officials, some of whom were not served.

Before the first deadline to produce Defendants' answers, I contacted Plaintiff's counsel, Mr. Solomon Radner, Esq., and he granted our request for an additional thirty days to respond. However, several of these officials have since retired and due to the excessive amount of individuals to whom interrogatories were directed, we need additional time to respond. I spoke to Mr. Radner approximately two weeks ago and he did not object to our request for more time.



November 29, 2022

Page 2

Although there is no discovery dispute, it is noted that Defendants' request for additional time would go beyond the December 1, 2022 deadline for fact discovery, therefore the parties cannot proceed under Rule 29. As a result, I respectfully request an extension to December 30, 2022, in which to provide Defendants' responses to interrogatories and document request.

Please note that on this date, I attempted to contact Mr. Radner again, for the conference today and to inform him of my intent to contact the court. Although I was not able to reach him, I do not anticipate that he would object to this request.

Respectfully submitted,

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: s/Marvin L. Freeman  
Marvin L. Freeman  
Deputy Attorney General